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*Counsel for Formentera Partners Fund I, LP*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

<b>In re:</b>	§	<b>Case No. 22-90000-mxm11</b>
	§	
<b>ROCKALL ENERGY HOLDINGS, LLC, <i>et al.</i>,</b>	§	<b>Chapter 11</b>
	§	
<b>Reorganized Debtors.</b>	§	<b>Jointly Administered</b>
	§	
_____	§	
	§	
<b>TALCO PETROLEUM LLC and</b>	§	
<b>WHITE MARLIN OPERATING</b>	§	
<b>CO., LLC,</b>	§	
	§	
<b>Plaintiffs</b>	§	
	§	
<b>v.</b>	§	<b>Adversary No. 23-09003-mxm</b>
	§	
<b>FORMENTERA PARTNERS</b>	§	
<b>FUND I, LP and U.S. SPECIALTY</b>	§	
<b>INSURANCE CO.,</b>	§	
	§	
<b>Defendants</b>	§	

**DEFENDANT FORMENTERA PARTNERS  
FUND I, LP'S RULE 12(B)(6) MOTION TO DISMISS**

Defendant Formentera Partners Fund I, LP; (“Formentera”), by and through undersigned counsel, hereby respectfully moves (this “Motion”) the Court to enter an order, substantively in the form of the proposed order attached hereto as **Exhibit A**, dismissing the claims of Plaintiffs Talco Petroleum LLC and White Marlin Operating Co., LLC against Formentera in the *Complaint and Request for Declaratory Judgment and Enforcement of Certain Provisions of Confirmed Plan* (Doc. 1) pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, made applicable to the above-styled adversary proceeding (the “AP”) by Rule 7012 of the Federal Rules of Bankruptcy Procedure.

In accordance with N.D. Tex. L.B.R. 7007-1(d) and (g), Formentea is filing, contemporaneously herewith: (a) the *Brief in Support of Defendant Formentera Partners Fund I, LP’s Rule 12(b)(6) Motion to Dismiss* (the “Brief”) and (b) the *Appendix in Support of Defendant Formentera Partners Fund I, LP’s Rule 12(b)(6) Motion to Dismiss*, together with the exhibits annexed thereto.

For the reasons set forth more fully in the Brief, Formentera requests that the Court (a) dismiss Plaintiffs’ claims against Formentera in the AP with prejudice and (b) grant Formentera such other and further relief as the Court deems just and proper.

Respectfully submitted this the 14th day of June, 2023.

/s/ Taylor W. Meek

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of June, 2023, a true and correct copy of the above Notice has been served electronically on all parties that are registered to receive electronic transmission through this Court's CM/ECF filing system in the above-styled adversary proceeding.

/s/ Taylor Meek  
OF COUNSEL